

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<i>In re:</i>	§	
	§	
HOUSTON REAL ESTATE PROPERTIES, LLC	§	Case No. 22-32998 (Chapter 7)
	§	
<u>Debtor,</u>	§	
	§	
JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF,	§	
	§	
Plaintiffs,	§	Adversary No. 23-03141
	§	
v.	§	
	§	
HOUSTON REAL ESTATE PROPERTIES, LLC, et al.,	§	
	§	
Respondents.	§	

**SHAHNAZ CHOUDHRI'S EMERGENCY MOTION TO
RESCHEDULE DEPOSITION**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE

THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE JUDGE OF SAID COURT:

TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Shahnaz Choudhri (“Shahnaz” or “Movant”) and files this Emergency Motion to Reschedule Deposition (the “Motion”) currently set to take place on November 8, 2024 and would respectfully show as follows:

**I.
SUMMARY OF REQUESTED RELIEF**

Movant’s deposition in this matter is presently scheduled for November 8, 2024 at 11:00AM in the attorney room at the federal courthouse for the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Late, on November 5, 2024, Movant became suddenly ill. Movant is currently addressing serious impacts to her health and is seeking emergency medical care. Unfortunately, due to this sudden and unforeseen illness, Movant is unable to attend the pre-scheduled deposition of November 8, 2024. Movant is willing to find another mutually agreeable time with opposing counsel to complete her deposition, subject to improvements to her health. Given the urgency of the requested relief, Movant respectfully seeks relief from the Court regarding this time sensitive matter by way of this Motion.

Lori Hood sent email correspondence to T. Michael Ballases on November 6, 2024 in an effort to reschedule the deposition for an alternate date, but an agreement could not be reached. (See Exhibit 1)

Emergency relief is requested on November 7, 2024, considering the deposition is scheduled for November 8, 2024 at 11:00am.

**II.
PRAYER**

Movant Shahnaz Choudhri respectfully requests that this Court grant this Emergency Motion to Reschedule Deposition presently set for November 8, 2024 at 11am.

Dated: November 7, 2024

Respectfully submitted,

/s/ James Q. Pope

James Q. Pope

TBN: 24048738

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on interested parties in the manner listed below on November 7, 2024.

23-03141 Notice will be electronically mailed, via the court's ECF noticing system to:

Thomas Michael Ballases on behalf of Plaintiff John Quinlan
ballases@hooverslovacek.com

Thomas Michael Ballases on behalf of Plaintiff Omar Khawaja
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Robert Paul Debelak, III on behalf of Creditor Cypress BridgeCo, LLC
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Robin L Harrison on behalf of Defendant A. Kelly Williams
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Timothy L. Wentworth on behalf of Defendant Randy W Williams Ch7 Trustee
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/s/ James Q. Pope
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